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**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF PUERTO RICO**  
**(Honorable US District Court Judge Carmen Consuelo Cerezo)**

**UNITED STATES OF AMERICA,**

Plaintiff

v.

**Luis Angel Monzon-Ocasio**

Defendant.

Criminal Case No. 17-088 (CCC)

**SENTENCING MEMORANDUM**

DATE: 02/15/2018

TIME: 12:30 p.m.

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**TO THE HONORABLE COURT:**

Luis Angel Monzon-Ocasio, by and through his attorney, Hector J Dauhajre, submits this Sentencing Memorandum pursuant to the now-advisory provisions of the Federal Sentencing Guidelines.

**PROCEDURAL HISTORY**

Mr. Monzon-Ocasio was charged with a four counts' Indictment, in violation of Title 21, United States Code, Sections 841(a)(1) and 860.

On July 7, 2017, Mr. Monson-Ocasio pled guilty to count Three pursuant to a "Plea and Forfeiture Agreement" with the government.

The relevant provisions of the Plea Agreement are as follows:

"As to count Three of the Indictment, the parties agree to recommend a sentence within the applicable Guideline Sentencing Range for a total offense level of

1 21, when combined with defendant's criminal history category as determined by the  
2 Court".

### 3 SENTENCING MEMORANDUM

4 Mr. Monzon-Ocasio is 29 years old. He was born and raised in Bayamon,  
5 Puerto Rico. Both of his parents are deceased. He is the youngest of four sisters.  
6 Mr. Monzon-Ocasio maintains an excellent relationship with all his siblings.

7 Mr. Monzon-Ocasio's basic needs were fulfilled by his parents. He did not  
8 suffer from abuse or neglect under their guidance. Notwithstanding, at age 8, Mr.  
9 Monzon-Ocasio suffered his parents' separation and absence. His parents' separation  
10 lasted 5 years for which he recognizes having suffered some kind of trauma.

11 In 1998, Mr. Monzon-Ocasio's brother was murdered. He was only 10 years'  
12 old, and could not deal with the loss without professional help. His parents took him  
13 to a psychologist for treatment. His desires and feelings for revenge were eventually  
14 treated and defeated. At age 21, Mr. Monzon-Ocasio had to deal with another family  
15 loss, when his mother died from a heart attack.

16 Mr. Monzon-Ocasio has been in a relationship with Ms. Wilnelys Feliciano for  
17 about a year and a half. They lived together for some time before his detention.  
18 They have plans to get married after prison and build a family together.

19 With respect to education, Mr. Monzon-Ocasio did not finish high school. He  
20 completed up to 10th grade but has a genuine plan to obtain his GED in order to help  
21 him find a good paying job. He would like to enter into a program towards achieving  
22 his GED while serving time.

23 Mr. Monzon-Ocasio worked for Econo Supermarkets for 2 years. Part of his  
24 duties, while in Econo, were receiving and dispatching merchandise and some credit  
25 department work. He had to quit work when his father was very ill due to cancer.  
26 For 6 months, Mr. Monzon-Ocasio bathe him, help him with respiratory therapies,  
27 cook for him, take him to medical appointments. He is still trying to recover from his  
28 father's death.

1 Before working for Econo, Mr. Monzon-Ocasio worked for several companies.  
2 He worked, for a year, as a dishwasher for Manjares Cafe & Grill; as a cheese peeler  
3 at Titan Factory; as a machine operator for Real Reel; 8 months for Transporte CJ, a  
4 moving company; as a plumber assistant, and also did some landscaping jobs.

5 Due to his father's terminal illness, Mr. Monzon-Ocasio needed to seek mental  
6 health treatment. Since June, 2016, date of his father's death, he has received  
7 mental health services from APS Healthcare Bayamon. Mr. Monzon-Ocasio has been  
8 diagnosed with psychosocial conditions and receives medication accordingly.

### 9 10 **ACCEPTANCE OF RESPONSIBILITY**

11 Mr. Monzon-Ocasio accepted responsibility for his wrongdoings in this case.  
12 He has expressed remorse for what he has done and realizes that his wrong decision  
13 has only separated him from his life goals. Mr. Monzon-Ocasio will not commit the  
14 same mistakes ever again. He recognizes failing both of his parents in spite of all the  
15 sacrifices they made for him.

16 After incarceration, Mr. Monzon-Ocasio wishes to relocate to the states  
17 (continental) and get a job to support his family to be. He sees himself having a  
18 family with Ms. Feliciano and living a law abiding life together.

### 19 20 **SENTENCING RECOMMENDATION**

21 Mr. Monzon-Ocasio has no prior convictions and readily admits his wrongdoing  
22 in this case. Mr. Garcia-Ruiz respectfully requests that this Court take into account  
23 the requirements of 18 U.S.C. § 3553(a) to ensure that the sentence is “sufficient, but  
24 not greater than necessary”, by addressing his motives, the need to provide just  
25 punishment and the need to avoid sentence disparities. The defense respectfully  
26 requests that this Court consider the sentence in light of Booker and its progeny, as  
27 well as Mr. Monzon-Ocasio's background, family losses and psychological conditions.  
28 A sentence no higher than 37 months is sufficient, but not greater than necessary, to

1 meet all the statutory requirements for a proper sentence. Mr. Monzon-Ocasio has  
2 learned his lesson and will not be involved in this type of behavior again.

3  
4 In San Juan, Puerto Rico, on February 13, 2017.

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8 **RESPECTFULLY SUBMITTED**

9  
10 **I HEREBY CERTIFY** that on this same day the present motion was electronically  
11 filed with the Clerk of the court and the attorneys of record through the CM/ECF  
12 electronic filing system.  
13

14 s:/Héctor J. Dauhajre

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